

FILED

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

2013 OCT -8 A 11:45

Alexandria Division

UNITED STATES DISTRICT COURT
ALEXANDRIA, VIRGINIA

UNITED STATES OF AMERICA

v.

CHARLES DANIEL STEPHENS,

Defendant.

CRIMINAL NO.: 1:13-CR-395

Count 1: 17 U.S.C. § 506 and 18 U.S.C. § 2319
(Criminal Copyright Infringement)

CRIMINAL INFORMATION

COUNT ONE

(Criminal Copyright Infringement)

THE UNITED STATES ATTORNEY CHARGES THAT:

1. Rosetta Stone Inc. (“Rosetta Stone”) is a corporation, headquartered in Arlington, Virginia, in the Eastern District of Virginia, that designs and sells, among other things, computer-assisted language software.
2. Microsoft Corporation (“Microsoft”) is a corporation headquartered in Redmond, Washington, that designs and sells, among other things, computer software, such as Microsoft Office and Microsoft Windows.
3. Adobe Systems Incorporated (“Adobe”) is a corporation, headquartered in San Jose, California, that designs and sells, among other things, computer software, such as Adobe Creative Suite and Adobe Illustrator.
4. Intuit Inc. (“Intuit”) is a corporation, headquartered in Mountain View, California, that designs and sells, among other things, computer software, such as Quicken.

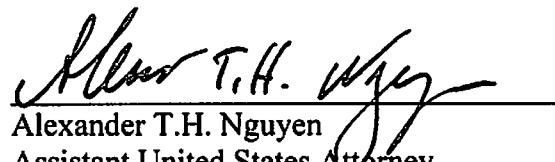
5. Symantec is a corporation, headquartered in Mountain View, California, that designs and sells, among other things, anti-virus software.

6. For the 180-day period beginning July 10, 2011 through January 5, 2012, in the Eastern District of Virginia and elsewhere, the defendant, CHARLES DANIEL STEPHENS, did willfully, and for purposes of commercial advantage and private financial gain, infringe copyrights in certain computer software, by reproducing and distributing, including by electronic means, during the 180-day period, at least ten copies of one or more copyrighted works of Rosetta Stone, Microsoft, Adobe, Intuit, and Symantec, which had a total retail value of more than \$2,500.

(All in violation of Title 17, United States Code, Section 506(a)(1)(A) and Title 18, United States Code, Section 2319(b)(1)).

DANA J. BOENTE
ACTING UNITED STATES ATTORNEY

By:


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Computer Crime & Intellectual Property Section